

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF
TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*,

Defendants.

Case No. 1:25-cv-02429-MKV

Supplemental Declaration of Andrew Geneslaw (Witness K)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS,

and

AMERICAN FEDERATION OF TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE. *et*
al.,

Defendants.

Case No. 1:25-cv-02429-MKV

SUPPLEMENTAL DECLARATION OF ANDREW GENESLAW

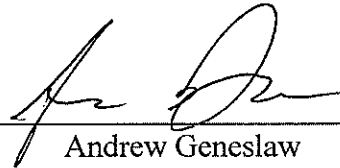
I, Andrew Geneslaw, hereby declare as follows:

1. I am an Assistant Professor of Pediatrics at the Columbia University Irving Medical Center (CUIMC), where I also serve as the Program Director for the Pediatric Critical Care Medicine Fellowship. I previously submitted a sealed declaration in this action describing my background. *See* Declaration of Witness K (May 8, 2025).
2. I have personal knowledge of the facts set forth in this declaration, and if called as a witness in this action, I could and would testify competently to these facts.
3. I initially sought to submit my declaration in this action under seal because I am frightened of the personal and professional risk that I may incur by speaking out about the harms caused by the government's actions, including the chilling of speech. But I believe that it is my duty as a citizen and physician to speak about these issues, and the fact that I am frightened highlights all the more clearly why it is necessary to speak. Although I continue to be afraid of the risks, I am willing to make my declaration public in light of the Court's decision on sealing,

as I understand the only alternative is to withdraw the submission. Others in my field may legitimately feel the risk is too great for them depending on their appearances, religious/cultural backgrounds, or family situations, and I hope that my own speech can be of service to them.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22 day of May 2025.



Andrew Geneslaw